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*MEMBER NJ & NY BAR

THE KILLIAN FIRM, P. C.

ATTORNEYS AT LAW

June 5, 2025

VIA ECF:

Hon. Sanket J. Bulsara, U.S.D.J.
United States District Court, E.D.N.Y.
100 Federal Plaza Courtroom
930 Central Islip, NY 11722

**Re: AA Medical, P.C. v. Iron Workers Local 40, 361 & 471 Health Fund, EDNY Docket
No. 2:22-cv-01249-SJB-LGD**

Dear Judge Bulsara:

This firm represents Plaintiff AA Medical, P.C., and—with opposing counsel’s gracious consent—respectfully moves to request a brief adjournment of the briefing schedule for the motion for summary judgment currently pending in the above-captioned matter. The current schedule calls for Plaintiff’s opposition brief to be filed by June 6, 2025, and Defendant’s reply brief to be filed by June 27, 2025. This request is made pursuant to Local Civil Rule 7.1(e) and in accordance with Your Honor’s Individual Practices. This is Plaintiff’s first request for an adjournment of the briefing schedule on this motion.

The grounds for this request are twofold. Initially, the undersigned experienced a brief period of illness which, in addition to having to take time off, further precipitated a need to refrain from physically going to the office for a period of time. As result, the undersigned has suffered an unfortunate delay in locating the moving papers served by Defendant, which has delayed the

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preparation of opposition papers. Opposing counsel has graciously provided Plaintiff with a digital copy of the moving papers and, having fully recovered, the undersigned is now well-positioned to respond to Defendant's motion for summary judgment. The additional time requested will allow for a perfected response.

Plaintiff respectfully requests a 21-day extension to the current briefing schedule, as follows:

- Plaintiff's opposition papers to be served by June 27, 2025.
- Defendant's reply papers to be served by July 18, 2025.

Plaintiff further notes that opposing counsel has graciously agreed to this request for an extension.

Plaintiff submits this request in compliance with Local Civil Rule 7.1(e) and Your Honor's Individual Practices, and apologizes for any inconvenience this may cause. Plaintiff appreciates the Court's understanding in this matter.

Thank you for your attention to this request. Please do not hesitate to contact me should you require any further information.

Yours truly,

THE KILLIAN FIRM, P.C.

By: /s/ Dimitri Teresh

